

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHANEL MOODY, AYANDA CARMICHAEL,  
AND RONNIE CLARK

Plaintiffs,

vs.

THE RELATED COMPANIES, L.P., AND  
ERY SOUTH RESIDENTIAL TOWER LLC,

Defendants.

Case No. 1:21-cv-6238 (VEC)

**Oral Argument Requested**

**NOTICE OF DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss Plaintiffs' Complaint, dated September 10, 2021, the Declaration of Gabriel Herrmann, dated September 10, 2021, and the exhibits annexed thereto, and such other and further papers and proceedings as may be filed herein, Defendants The Related Companies, L.P. and ERY South Residential Tower, LLC, by and through undersigned counsel, hereby move this Court, before the Honorable Valerie E. Caproni, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 443, New York, New York 10007, for an Order dismissing Plaintiff's Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6), and granting such other and further relief as the Court deems appropriate.

Dated: New York, New York  
September 10, 2021

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Randy M. Mastro

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